

MEMO ENDORSED

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July 2, 2024

VIA ECFHonorable Andrew L. Carter, Jr.
United States Courthouse
40 Foley Square
New York, New York 10007Re: Pioneer Business Services, LLC v. VistaJet US, Inc. – 22 cv 06206 (ALC)

Dear Judge Carter:

We are attorneys for plaintiff Pioneer Business Services, LLC d/b/a Four Corners Aviation Services (“FCA”). We write with respect to the Order dated June 4, 2024 (Dkt. 223) and the deadline for restoration to the calendar set forth in the Order. We have conferred with counsel for defendant VistaJet US, Inc. (“VistaJet”), which joins in the request set forth herein.

The Order discontinued this action, without prejudice, permitting either party to submit an application to restore this action to the calendar provided that the application to do so is made within 30 days of the date of the Order. That deadline expires tomorrow, July 3, 2024.

The parties have been working assiduously to complete their settlement negotiations and to sign a written settlement agreement. There is still some work that remains to be done in order to effectuate a settlement, and the parties regret that those efforts cannot be concluded prior to tomorrow’s restoration deadline.

Accordingly, both FCA and VistaJet respectfully request that Your Honor extend the deadline to restore the action for an additional 21 days to July 24, 2024. The parties are confident that they can complete a settlement prior to such time. Such an extension will avoid the parties having to make an application to restore the action to the calendar in order to preserve their rights while settlement efforts continue.

Thank you for Your Honor’s consideration.

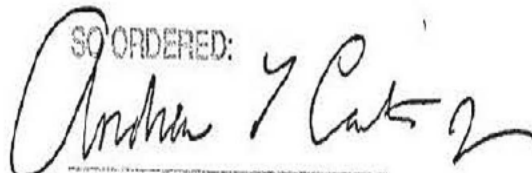
Respectfully,

/s/ H. Peter Haveles, Jr.

H. Peter Haveles, Jr.

cc: All counsel of record

akerman.com

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: July 3, 2024